

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

AVRAHAM GOLDMAN, *et al.*,

Plaintiffs,

v.

LAFARGE S.A., *et al.*,

Defendants.

Civil No. 1:24-cv-01043-NGG-PK

ORAL ARGUMENT REQUESTED

HELEN JANE WILSON, *et al.*,

Plaintiffs,

v.

LAFARGE S.A., *et al.*,

Defendants.

Civil No. 1:25-cv-01975-NGG-PK

ORAL ARGUMENT REQUESTED

**DEFENDANTS' NOTICE OF MOTION TO DISMISS
PLAINTIFFS' PRIMARY LIABILITY CLAIMS**

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendants Lafarge S.A., Lafarge Cement Holding Limited, and Lafarge Cement Syria S.A. hereby move the Honorable Nicholas G. Garaufis, United States District Judge, of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Room 1426 S, Brooklyn, New York 11201, to dismiss with prejudice the primary liability claims in Plaintiffs' Complaints (*Goldman* Dkt.1, Counts I-III; *Wilson* Dkt.1, Counts IV-VI) pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon this Notice of Motion, the accompanying Memorandum in support thereof, and such other

authorities as may be submitted in any reply or at any hearing. A proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: December 22, 2025

Respectfully submitted,

/s/ David W. Bowker

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